

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

2016 MAY -5 PM 2:17  
CLERK

BY Jes  
DEPUTY CLERK

UNITED STATES OF AMERICA,

v.

MATTHEW T. MARTIN,  
Defendant.

Criminal No. 1:16-cr-64

**INDICTMENT**

The Grand Jury charges as follows:

**COUNT ONE**  
**(ARMED BANK ROBBERY)**

On or about December 14, 2015, in the District of Vermont, the defendant, MATTHEW MARTIN, by force, violence, and intimidation, did take from the person and presence of another, money belonging to and in the care, custody, control, management, and possession of a branch of the People's United Bank, located at 100 Main Street, Brattleboro, Vermont, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

In committing this offense, the defendant, MATTHEW MARTIN, did assault and put in jeopardy the life of another person by the use of a dangerous weapon and device, specifically, a BB gun that resembled a firearm and a device that purported to be a bomb.

(18 U.S.C. §§ 2113(a) and 2113(d))

**COUNT TWO**  
**(ARMED CREDIT UNION ROBBERY)**

On or about December 21, 2015, in the District of Vermont, the defendant, MATTHEW MARTIN, by force, violence, and intimidation, did take from the person and presence of another, money belonging to and in the care, custody, control, management, and possession of a branch of the Heritage Family Credit Union, located at 198 Main Street, Ludlow, Vermont, the deposits of which were then insured by the National Credit Union Administration.

In committing this offense, the defendant, MATTHEW MARTIN, did assault and put in jeopardy the life of another person by the use of a dangerous weapon, specifically, a BB gun that resembled a firearm.

(18 U.S.C. §§ 2113(a) and 2113(d))

A TRUE BILL

  
F

ERIC S. MILLER  
United States Attorney

Presented by:

  
\_\_\_\_\_  
KUNAL PASRICHA  
Assistant United States Attorney

Burlington, Vermont  
May 5, 2016